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**UNITED STATES DISTRICT COURT**  
for the  
**Eastern District of Michigan**

United States of America

v.

Daniel M. Vorberg

Case:2:19-mj-30561  
 Judge: Unassigned,  
 Filed: 10-27-2019 At 01:39 PM  
 USA v. DANIEL M. VORBERG(CMP)(MLW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 24 to October 26, 2019 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

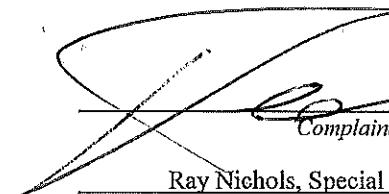
*Code Section**Offense Description*

18 USC § 2422(b)

Attempted Enticement of a Minor

This criminal complaint is based on these facts:  
 see attached affidavit.

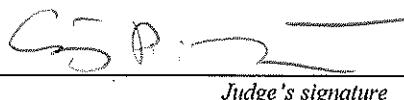
Continued on the attached sheet.



*Ray Nichols*  
**Complainant's signature**  
Ray Nichols, Special Agent FBI  
**Printed name and title**

Sworn to before me and signed in my presence.

Date: October 27, 2019



*GSP: -*  
**Judge's signature**

City and state: Detroit, Michigan

Hon. Anthony P. Patti, United States Magistrate Judge  
**Printed name and title**

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT  
AND ARREST WARRANT**

I Raymond C. Nichols, having been first duly sworn, do hereby depose and state as follows:

**I. INTRODUCTION**

1. I have been employed as a Special Agent of the FBI since February of 2012. I am currently assigned to the FBI Detroit Division. As a Special Agent, I investigate federal criminal violations related to Internet fraud, computer intrusions, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations. Before joining the FBI, I obtained a bachelor's degree in computer information systems and employed as a network/server administrator for approximately nine years.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **DANIEL M. VORBERG** (date of birth \*\*/\*\*/1982) for violating 18 U.S.C. § 2422(b), attempted coercion and enticement of a minor.

3. The statements contained in this affidavit are based in part on written reports from other law enforcement agents, independent investigation and analysis by law enforcement officers/analysts, and my experience, training and background

as a Special Agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to law enforcement concerning this investigation. The facts set forth establish probable cause that **VORBERG** has violated Title 18 U.S.C. § 2422(b) (attempted enticement of a minor).

## II. PROBABLE CAUSE

4. In July of 2019, Lieutenant Gordon May of the Brownstown Police Department (BPD) contacted the FBI. BPD had an ongoing investigation regarding the sexual exploitation of a minor. In December of 2018, the mother of a Brownstown minor female child (MV-1) reported that she caught MV-1 attempting to sneak out of her house to meet “Jacob.”

5. MV-1 confided in her mother that she had been in communication with “**Jacob**” who used telephone number **708-xxx-xx95**. MV-1 subsequently participated in a forensic interview and made the following statements:

- a. “**Jacob**” told her, among other things, that he lived 4 hours away, drove a 4x4, worked in construction, and was going to take MV-1’s “virginity,”
- b. On the night that “Jacob” was supposed to come pickup MV-1 to engage in sex acts, she missed numerous calls from him; and
- c. MV-1 never actually met with “**Jacob**” because her dog/s woke

her mother up.

6. In January of 2019, BPD obtained a search warrant for telephone number 708-xxx-xx95. AT&T identified the subscriber as DANIEL M. VORBERG, date of birth xx/xx/1982, with an address in Oak Lawn, Illinois.

7. On July 31, 2019, the FBI conducted a search for vehicles registered to DANIEL M. VORBERG at that address and found a Chevrolet Silverado 1500 with Illinois license plate number 23xxxx9B. A criminal history search for VORBERG revealed charges in the State of Illinois for the following:

- a. 9/28/2004 – contributing to the delinquency of a minor;
- b. 1/21/2005 – battery / bodily harm;
- c. 10/07/2009 – child abduction / kidnapping / indecent exposure;  
and
- d. 5/1/2013 and 6/19/2015 – indecent exposure.

8. According to a news article dated June 14, 2014, VORBERG was found guilty of public indecency by a jury in relation to an April 30, 2013, incident in Illinois. Per the article, two adult witnesses observed VORBERG masturbating while aiming his cell phone at a group of children playing nearby. VORBERG was sentenced to three years in the Illinois Department of Corrections for this offense.

9. On or about October 24, 2019, the FBI contacted VORBERG through an online undercover employee (OCE) assuming the persona of a 13-year-old

female. On October 24, 2019, the OCE sent the text message “WYD” (what you doing?) to 708-xxx-xx95. VORBERG responded that he was getting ready for work. The OCE asked him if VORBERG remembered her and that she believed VOLBERG’s name was Ben, a person she previously met in a chat room. VORBERG responded that his name was “Jacob.” VORBERG asked for a picture of the OCE. The OCE sent him a photo of what appeared to be a thirteen-year-old child and asked, “remember me now.” VORBERG responded, “I’d remember the naughty ones.” VORBERG then sent the OCE a photo of himself, to which the OCE responded, “Lol, your not Ben, you’re a grown man. Im only 13.”

10. On October 24, 2019, VORBERG sent a message to the OCE which stated, “I drove to Michigan to meet a girl your age before and I thought that’s who you were. Her parents caught her trying to sneak out though.”

11. Throughout October 24, 2019, VORBERG continued to ask the OCE for photographs. The OCE provided non-pornographic photographs. In response to one photo, VORBERG stated, “You should def take that picture without that shirt.” VORBERG turned the conversation sexual stating, “I’d love to lick you mmm.” VORBERG asked the OCE about her experience with oral sex and offered to perform it on her. VORBERG asked the OCE where she lived. The OCE responded that she lived in Wyandotte, Michigan. VORBERG said that he lived near Chicago but would be willing to make a five hour drive to meet the OCE.

VORBERG sent a screen shot of a map showing the route from Chicago to Wyandotte.

12. VORBERG continued to discuss sex acts and the OCE's sexual experiences. VORBERG asked the OCE how tall she was. The OCE responded, "lol not even 5." VORBERG stated, "Oh wow lol I always wanted a tiny young girl." In the late evening hours, VORBERG told the OCE, "I'd love for you to grind that tight pussy over my fat dick mmm." VORBERG asked the OCE, "What if I came there, would you meet up fr [for real]?" The OCE agreed that she would meet VORBERG. The two began to discuss how she would sneak out of her house and where they could have sex. VORBERG indicated that the two could have sex in his truck, get a hotel, or go to a park. VORBERG sent a picture of his truck to the OCE, which was a Chevy Silverado 1500, which appeared to match the one known to be registered to him. The OCE told VORBERG that there was a park near her house by the river and that they could meet there. VORBERG then continued to request pictures of the OCE. The OCE provided non-sexual pictures that appeared to depict a young teenage girl. Again, VORBERG made a comment about a sex act with each picture.

13. On October 24, 2019, VORBERG sent a video depicting what appeared to be an adult male masturbating. He indicated he was "jerking off" to the OCE's photos. At one point, VORBERG stated "I'd love to bend you over and

fuck you from behind." VORBERG asked the OCE to send him a picture of her in her panties. When the OCE was slow to respond, VORBERG stated, "Ok but now you gotta send without panties too." The OCE did not send the requested picture to VORBERG.

14. Unless otherwise indicated, the following events occurred on October 25, 2019: OCE and VORBERG continued to communicate via text. The conversation was extremely sexual with VORBERG. He continued to ask the OCE that, if he came to her house, would she be able to sneak out. VORBERG expressed a concern with getting in trouble with the law if he was to be caught with the OCE. The OCE told VORBERG, "We don't have to do it at all if you don't want." VORBERG responded, "Oh we are doing it," "Im going to lick you first through." The OCE told VORBERG that he would have to use a condom for sex. He said that he had some.

15. VORBERG asked for a description of what the OCE was wearing. The OCE described a black shirt with blue/black flannel over shirt. VORBERG told the OCE that he had a flannel on. He sent the OCE a photograph of himself wearing a yellow flannel shirt. The OCE responded, "we could be twinsies," to which VORBERG replied, "and we should fuck."

16. At approximately 6:40 p.m., VORBERG texted the OCE stating, "I'm so horny for you rn [right now]," "Can you sneak out at midnight? Lol I want to go

there rn." The OCE told VORBERG that her mom would be asleep and that she could sneak out. The OCE warned him that she would need to be back home before her mom woke up the next morning. VORBERG asked for the location of the park near the OCE's home. The OCE sent VORBERG a link to a Google Map showing the location of the park near Southfield Road and West Jefferson in Ecorse, Michigan. VORBERG asked the OCE if there would be any cops at the park. He indicated he was concerned because his truck had Illinois plates.

17. VORBERG asked the OCE if she would really meet him if he came. The OCE said yes and VORBERG told her, "If anything does happen say you told me that you are 18 and we didn't talk or do anything sexual." At approximately 7:09 p.m., VORBERG told the OCE, "But if I go there and you change your mind I'm raping you lol."

18. At approximately 7:50 p.m., VORBERG indicated he was on the way to the park to meet the OCE. Along the way, VORBERG continued to text the OCE with updates on his location. At approximately 8:16 p.m., VORBERG told the OCE he was in Indiana. While driving, VORBERG texted the OCE, "Have any of your friends had sex yet?" The OCE told VORBERG that some of her friends said they have, and that there was a rumor that one of the girls in her class got pregnant. VORBERG then asked, "Oh shit what grade 8<sup>th</sup>? Or freshman or is that 7<sup>th</sup> I forget." The OCE responded, "8<sup>th</sup>."

19. On or about 8:55 p.m., VORBERG sent the OCE a picture of a "Pure Michigan" sign and said, "In Michigan." Throughout the night, VORBERG sent pictures of his speedometer indicating he was, at times, driving up to 100 m.p.h. on his way to Ecorse to meet the OCE.

20. In anticipation of VORBERG's arrival in Ecorse, the FBI's Southeast Michigan Trafficking and Exploitation Crimes Task Force (SEMTEC), along with the Violent Crime Task Force, (VCTF), Michigan State Police, and Brownstown Police Department, setup surveillance in the vicinity of the park.

21. At approximately 12:20 a.m., on October 26, 2019, surveillance observed a truck matching the description of the truck registered to VORBERG. The vehicle traveled on Southfield Road and turned south onto W. Jefferson in Ecorse. The vehicle pulled to the curb on the west side of W. Jefferson across from and within 50 feet of the park. The OCE received a message from VORBERG at approximately 12:24 a.m. which stated, "I'm here though ☺." Surveillance then observed the vehicle pull on to W. Jefferson heading south and turn onto Bourassa Street. A traffic stop was then conducted near the intersection of Bourassa Street and Monroe Street. The driver of the vehicle was identified as VORBERG and taken into custody.

22. VORBERG wore what appeared to be the yellow flannel shirt depicted in the photo he had sent the OCE. On his person was a condom and a box

cutter.

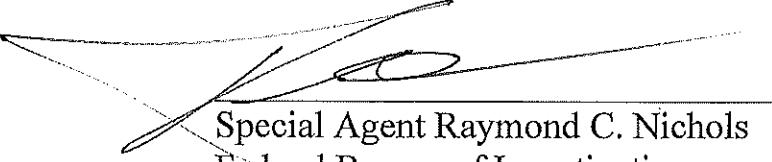
23. While on scene, Affiant was advised that an iPhone, in plain view, was on the passenger seat of the Chevy Silverado that VORBERG was driving. Affiant called telephone number **708-xxx-xx95** from the OCE's phone. The iPhone began to ring and showed the OCE's phone number on the screen. Additionally, visible on the screen of the iPhone, was the last text message sent to VORBERG from the OCE.

24. VORBERG was then transported to the Brownstown Police Department for an interview. VORBERG was afforded the opportunity to call his mother. During the call, a Brownstown Police Officer overheard VORBERG attempt to provide his mother with what may have been a username and password. VORBERG was overheard telling her to "wipe it clean."

25. Under Michigan Compiled Laws Section 750.520d(1)(a) (third degree criminal sexual conduct), it is a felony to engage in sexual penetration with another person if that person is at least 13 years of age and under 16 years of age. Violation of the statute is punishable by imprisonment for not more than 15 years.

### III. CONCLUSION

26. Probable cause exists that DANIEL M. VORBERG violated 18 U.S.C. § 2422(b)(c), attempted coercion and enticement of a minor.



Special Agent Raymond C. Nichols  
Federal Bureau of Investigation

Sworn and subscribed before me  
On this 27th day of October, 2019.



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ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE